

**In the Matter Of:**  
**Bernard vs Fayetteville State University**

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**SANDRA WILLIAMS**

*April 09, 2025*

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
3                   WESTERN DIVISION  
4                   Civil Action No.: 5:24-cv-00219-BO-RN

5                   LISA BERNARD, )  
6                         )  
7                         Plaintiff, )  
8                         )  
9                         vs. )  
10                      )  
11                   FAYETTEVILLE STATE UNIVERSITY, )  
12                         )  
13                         Defendant. )  
14                         )  
15                         )  
16                         )  
17                         )  
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23                         )  
24                         )  
25                         )

14                   DEPOSITION VIA ZOOM VIDEO CONFERENCE  
15                         OF  
16                         SANDRA WILLIAMS

17  
18                         Taken by Plaintiff  
19                         April 9, 2025  
20                         2:00 p.m.  
21  
22                         Reported by: Ann Marie Agranoff  
23                         Professional Reporter  
24  
25

1 APPEARANCES  
2

3 For the Plaintiff:

4 OSBORN, GAMBALE, BECKLEY & BUDD PLLC  
5 By: Joseph D. Budd, Esq.  
6 721 W. Morgan Street  
7 Raleigh, North Carolina 27603  
8 Email: joe@counselcarolina.com

9 For the Defendant:

10 NC DEPARTMENT OF JUSTICE  
11 By: Jeremy D. Lindsley, Esq.  
12 Assistant Attorney General  
13 P.O. Box 629  
14 Raleigh, NC 27602-0629  
15 Email: jlindsley@ncdoj.gov

16  
17 Deposition of SANDRA WILLIAMS, taken by the  
18 Plaintiff via Zoom Video Conference on April 9, 2025  
19 at 2:00 p.m., before Ann Marie Agranoff, Professional  
20 Reporter, Notary Public.

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1 PROCEEDINGS

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3 Whereupon,

4 SANDRA GAIL WILLIAMS,

5 having been first duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 BY MR. BUDD:

9 Q. Good afternoon, Ms. Williams. Thank you  
10 for adjusting your schedule on my behalf today. I  
11 appreciate it. And I appreciate you taking your  
12 time to sit for this deposition with us today.

13 My name, for the record, is Joseph Budd. I  
14 represent Ms. Bernard in this matter.

15 Ms. Williams, have you ever been deposed  
16 before?

17 A. No.

18 Q. Okay. Have you ever given sworn testimony  
19 in any context before, aside from a deposition?

20 A. No.

21 Q. Okay. Do you understand that you have just  
22 given an oath -- taken an oath to tell the truth  
23 today?

24 A. Yes.

25 Q. And is there anything you don't understand

1 about the oath or your obligation to tell the  
2 truth?

3 A. No.

4 Q. Are you on any medication that would  
5 interfere with your ability to listen to,  
6 understand and answer my questions truthfully?

7 A. No.

8 Q. Are you aware of anything at all that would  
9 prevent you from answering my questions truthfully  
10 and honestly today?

11 A. No.

12 Q. Since this is your first deposition I'm  
13 just going to go through some basic ground rules  
14 that will make hopefully both of our lives and  
15 Ms. Ann Marie's life a lot easier today.

16 So first off, there may be times today  
17 where I ask you questions that you don't fully  
18 understand what I'm asking. If that happens at any  
19 point and you don't understand what I'm asking,  
20 will you please agree to just ask me to rephrase  
21 the question?

22 A. Yes.

23 Q. And so would you agree that if you answer  
24 any question today that means you fully understood  
25 the question that I asked?

1 A. Yes.

2 Q. Just so that there's no miscommunication  
3 here today, if I ever ask you -- or if you ever  
4 think that I am asking you for what you talked to  
5 your attorneys about, that's not what I'm asking  
6 about. Okay? I don't know what other attorneys  
7 aside from Mr. Lindsley you've spoken with and I  
8 really am not that interested in it and I certainly  
9 don't want to know what all you talked about with  
10 him. Okay?

11 A. Okay.

12 Q. I would love to know what's going on in  
13 that room but that's not what I'm asking you today.  
14 Okay?

15 If you need a break at any point today,  
16 just feel free to let me know. This is not a  
17 marathon. I certainly do not expect us to be here  
18 for a terribly long amount of time. But please  
19 just let us know if you need a break. The only  
20 thing that I ask is that if I am asking -- if I  
21 have asked a question that you answer it before you  
22 take the break. Okay?

23 A. Yes.

24 Q. Last thing. Our court reporter cannot keep  
25 a clear record of our testimony and my questions if

1 we talk over each other. Okay? So will you agree  
2 to wait until I finish asking the question before  
3 you answer it?

4 A. Yes.

5 Q. You've done a terrific job of that so far.  
6 It is very difficult and I apologize if I interrupt  
7 you at any point. Okay? In advance.

8 Similarly anything -- your answers always  
9 have to be verbal. Okay? That means no uh-huhs or  
10 uh-uh or mm-hmm. It's always going to be yes or  
11 no. And if I ask you to rephrase that and clarify  
12 that I'm really not trying to be rude, it's just  
13 going to come out kind of rude but that's the  
14 purpose of if I have to ask that follow-up  
15 question. Okay?

16 A. Yes.

17 Q. Okay. Again, just for the clarity of the  
18 record's sake this afternoon I'm going to use a few  
19 terms that I just want to make sure that you fully  
20 understand what I mean when I say them. If I say  
21 plaintiff, Lisa or Ms. Bernard, I'm referring to my  
22 client, Ms. Bernard.

23 Do you understand that?

24 A. Yes.

25 Q. And if I use the term University, defendant

1 or FSU, I'm going to be referring to defendant  
2 Fayetteville University.

3 Do you understand that?

4 A. Yes.

5 Q. All right. Ms. Williams, have you done  
6 anything to prepare for today's deposition? And  
7 again, I'm not asking for what you talked about  
8 with your counsel.

9 A. Yes.

10 Q. What have you done to prepare for today?

11 A. I've reviewed documents and I've also  
12 reviewed emails and timelines within my department  
13 and within my email.

14 Q. Okay. Are those all documents that have  
15 been produced to us in discovery?

16 A. Yes.

17 Q. Okay. What -- strike that.

18 How many hours did you spend preparing for  
19 today? I'm not necessarily asking how long you've  
20 spent working on responding to discovery and all of  
21 that. I mean just preparing for your deposition  
22 today.

23 A. My guess would be five to ten hours.

24 Q. How did you decide which documents to  
25 review in preparation for today?

A. Documents that were shared in this suit, those are the documents I reviewed.

Q. So did you review everything that has been shared in preparation for today?

A. I reviewed all documents that were shared with me for this lawsuit.

Q. Okay. Were those shared with you by the attorney or what?

MR. LINDSLEY: Well, objection.

MR. BUDD: Yeah. All right. We'll move on.

BY MR. BUDD:

Q. When was the last time you did any document review to prepare for today?

A. Last night.

Q. In your preparations is there anything that you would have liked to review but you were unable to do so?

A. No.

Q. Ms. Williams, just a little bit of background information on you personally, if you don't mind.

Do you have any college degrees?

A. Yes.

Q. And what are those in?

1           A. Bachelor of arts degree in business  
2 administration.

3           Q. And when did you receive that?

4           A. 1999.

5           Q. And where did you receive that from?

6           A. Columbia College.

7           Q. And where is that?

8           A. Missouri.

9           Q. Any other collegiate degrees?

10          A. No.

11          Q. Any post graduate education?

12          A. I took one to two courses.

13          Q. In what -- what were those courses in?

14          A. Master's of business administration.

15          Q. And where did you do those?

16          A. At Fayetteville State University.

17          Q. When did you do those?

18          A. Around 2022, 2023, if I recollect those  
19 years.

20          Q. What were those -- strike that.

21                 Did you -- are you still taking any MBA  
22 classes?

23          A. No.

24          Q. Did you receive a Master's in business  
25 administration?

1 A. No.

2 Q. Do you have any plans to continue your  
3 training to receive a Master's in business  
4 administration?

5 A. Yes.

6 Q. When -- we know how plans go but what --  
7 when are you thinking about resuming those studies?

8 A. I'm not sure yet. Undecided.

9 Q. About how many more hours do you have  
10 before you're able to earn that Master's?

11 A. I'm not -- vaguely remember the amount of  
12 credits available that I would need to graduate  
13 with a Master's. I don't remember.

14 Q. Can you estimate about how many classes you  
15 think that would require?

16 A. 60, maybe 60 credits. Might be less.

17 Q. Okay. Ms. Williams, what is your date of  
18 birth?

19 A. March 18, 1958.

20 Q. Okay. Have you ever received any training  
21 in employment law or human resources?

22 A. No.

23 Q. How long have you been employed by the  
24 University?

25 A. A little over eighteen years.

1 Q. Has it always been in the same role?

2 A. No.

3 Q. If you could you walk me through the  
4 positions that you've served in over the last  
5 eighteen years with the University.

6 A. Executive assistant.

7 Q. How long were you an executive assistant  
8 for?

9 A. Less than two years.

10 Q. Okay. Then what?

11 A. Executive director of academic budgeting.

12 Q. Okay. How long were you in that job?

13 A. About fourteen years.

14 Q. Then where did you go to?

15 A. To my current role, associate vice  
16 chancellor for budgets, financial planning and  
17 analysis.

18 Q. So how long have you been in that position?

19 A. March, 2022.

20 Q. When you were executive director of  
21 academic budgeting I apologize if this sounds like  
22 a dumb question or ignorant question -- but is that  
23 in the same department or division that you are in  
24 currently?

25 A. No.

1 Q. Okay. What division was it in?

2 A. Academic affairs.

3 Q. Did you have to apply to become associate  
4 vice chancellor?

5 A. Actually it was a recruitment waiver.

6 Q. What does that mean?

7 A. A recruitment waiver signed off by the  
8 current chancellor. The waiver is approved by a  
9 chancellor if there has been so many transitions or  
10 issues with candidates applying and you -- HR would  
11 be able to provide -- it's a whole HR process.

12 Q. All right. So am I correct that your  
13 testimony is that you did not apply for the  
14 position of associate vice chancellor but that you  
15 were recruited into it?

16 A. Yes.

17 Q. Is it an SHRA position or an EHRA position?

18 A. No. It was not an SHRA position it was  
19 EHRA.

20 Q. Is it still an EHRA position?

21 A. Yes.

22 Q. In your experience -- I think you answered  
23 it but again I apologize for being ignorant and not  
24 fully understanding. What qualifies a person for a  
25 recruitment waiver?

1           A. You would -- HR would have to identify  
2 that.

3           Q. Okay. Ms. Williams, when you are  
4 discussing -- let's -- sorry.

5                 Still associate vice chancellor position,  
6 what -- how would you describe your current  
7 position? What are your job responsibilities?

8           A. The job responsibilities for the budgets of  
9 the University total, the general state  
10 appropriation funding, position control, non state  
11 budget realignment, forecasting, analysis and  
12 projection.

13           Q. Are there any education requirements for  
14 your current position?

15           A. For the role?

16           Q. Yes, ma'am.

17           A. At least a Bachelor's degree.

18           Q. Okay. In your role, do you oversee any or  
19 supervise any employees?

20           A. Yes.

21           Q. How many?

22           A. I currently supervise three employees.

23           Q. Has that always been the case in this role?

24           A. No.

25           Q. Okay. How many -- what's the most

1 employees you've supervised in this role?

2 A. Four employees.

3 Q. And what's the fewest number of employees

4 you've supervised?

5 A. Three.

6 Q. How long have you known Ms. Bernard?

7 A. Three -- the years since March, 2022.

8 Q. Okay. So I think -- is it safe to say that

9 you did not know Ms. Bernard prior to your

10 assumption of the role of associate vice

11 chancellor?

12 A. I knew her better in the role when I became

13 associate vice chancellor.

14 Q. You did know her before?

15 A. Her name, yes.

16 Q. Oh, okay.

17 A. So correction. I knew her name. I knew

18 what her role and responsibilities were as the

19 executive director of academic budgeting.

20 Q. Okay. Thank you. Had you ever met

21 Ms. Bernard prior to your assumption of the role of

22 associate vice chancellor?

23 A. Yes.

24 Q. When did you first meet her?

25 A. In the role as executive director for

1 academic budgeting.

2 Q. Do you think that was -- do you have an  
3 approximate date range as to how long before or  
4 when that happened?

5 A. No.

6 Q. Was it more than five years before you  
7 became associate vice chancellor?

8 A. Yes.

9 Q. Was it more than ten years before you  
10 became associate vice chancellor?

11 A. It could be five to ten. I'm trying to  
12 recollect.

13 Q. That's fine. Yeah. I'm just trying to  
14 understand and figure out what you remember. So if  
15 that's what you remember, I appreciate that.

16 At any time prior to your assumption of  
17 that position, did you ever work with Ms. Bernard  
18 on anything?

19 A. No.

20 Q. About how long did you work with  
21 Ms. Bernard in the budget office?

22 A. Since March, 2022.

23 Q. Okay. Until her discharge? Until her  
24 discharge from the position?

25 A. Could you rephrase -- discharge?

1 Q. Yeah.

2 A. I don't understand.

3 Q. Her -- her termination -- the termination  
4 of her employment, the discharge, when she left  
5 that role.

6 A. In the reduction of force process?

7 Q. Sure.

8 A. Okay.

9 Q. When was that?

10 A. April -- March, I believe of 2023.

11 Q. Okay. So you worked with her for about a  
12 year though then between the time that she was --  
13 she was -- before she was laid off?

14 A. Until April, 2023.

15 Q. Okay. How many hours a day did you spend  
16 working with Ms. Bernard in those -- in that year?

17 A. Normally eight hours.

18 Q. Eight hours a day?

19 A. It was at least eight hours a day.

20 Q. Okay. Were you observing Ms. Bernard's  
21 work all eight hours a day or was there some --  
22 about how many hours a day were you observing her  
23 work?

24 A. Could you rephrase? What do you mean as  
25 observing her work?

1           Q. Sure. I'll give you an example. I've got  
2 my colleague Ayesha here watching this deposition.  
3 She is -- she works with me in my office. We are  
4 here all the time together. I am -- just because  
5 I'm in the same office as her eight hours a day  
6 does not necessarily mean that I am observing her  
7 fully eight hours a day. So I guess I'm just  
8 trying to understand how many hours a day were you  
9 actually performing work assignments with

10 Ms. Bernard?

11           A. It wasn't routinely -- one day could be the  
12 whole eight hours, depending on the project we  
13 worked. Another day it could be three to four  
14 hours.

15           Q. Okay.

16           A. Another day could be two to four hours.

17           Q. Okay. You think two to four hours is the  
18 least amount of time?

19           A. It's the least.

20           Q. Okay. Thank you.

21           Ms. Williams, are you familiar with the  
22 North Carolina human resources manual?

23           A. No.

24           Q. Okay. If you're not familiar with it then,  
25 I will state that it says that the state is

1 committed to the insuring the administration and  
2 implementation of all human resources policies,  
3 practices and programs are equit -- fair and  
4 equitable. State agencies, departments and  
5 universities shall be accountable for administering  
6 all aspects of employment, including hiring,  
7 dismissal, compensation, job assignment,  
8 classification, promotion, reduction in force,  
9 training, benefits and any other terms and  
10 conditions of employment are done in accordance  
11 with federal and state EEO laws and policies.

12 Do you share this commitment as set out in  
13 the state human resources manual?

14 MR. LINDSLEY: Objection.

15 MR. BUDD: You can answer if you  
16 understood the question.

17 THE WITNESS: That is not my role.  
18 That's a human resources function.

19 MR. BUDD: Okay. Are you stating that  
20 you are outside and exempt from the human resources  
21 policies of the state?

22 THE WITNESS: I follow direction from  
23 the human resources office regarding the manual.

24 MR. BUDD: Okay. Is it your  
25 contention that you are not governed by the human

1 resources manual?

2 MR. LINDSLEY: Objection.

3 MR. BUDD: You can answer if you're  
4 able to.

5 THE WITNESS: I follow the direction  
6 and guidance from the human resources office  
7 regarding the manual.

8 MR. BUDD: Let me ask a different way.

9 Do you personally share the commitment that  
10 is expressed in that -- what I just said?

11 MR. LINDSLEY: Objection.

12 MR. BUDD: That you are committed to  
13 administering reductions in force in accordance  
14 with federal and state EEO laws and policies.

15 MR. LINDSLEY: Objection.

16 THE WITNESS: Are you waiting for me  
17 to give a response?

18 BY MR. BUDD:

19 Q. I am. Yes, ma'am.

20 A. I follow the guidance and direction from my  
21 human resources office regarding the human  
22 resources manual.

23 Q. Okay. What has the human resources  
24 department told you about the human resources  
25 manual?

1           A. That I will follow the directions based on  
2       human resources department's direction and guidance  
3       for the manual.

4           Q. Okay. Have they ever told you that you  
5       need to act in accordance with federal and state  
6       EEO laws and policies?

7           A. I follow the guidance and direction they  
8       give me.

9           Q. Ma'am, that's not an answer to the question  
10      I asked.

11           Have they ever told you that you need to  
12      act in accordance with federal and state EEO laws  
13      and policies?

14           A. Based on the manual. I just don't  
15      recollect that they actually told me. I know I  
16      follow the direction and procedures of federal and  
17      state regulations for state human resources.

18           Q. But I believe your testimony earlier was  
19      you're not familiar with the state human resources  
20      manual. Correct?

21           A. It's based on what direction they give me.  
22      Human resources notifies me of the guidelines and  
23      directions, and I follow them.

24           Q. Okay.

25           A. So if the federal regulations state, that's

1 what they tell me, I follow them.

2 Q. And again, have they ever told you you need  
3 to act in accordance with those laws and policies,  
4 specifically?

5 MR. LINDSLEY: Objection.

6 MR. BUDD: Yes, no or I don't  
7 remember.

8 MR. LINDSLEY: Joe -- objection.

9 You've asked this question and she's answered the  
10 best way she can that she follows the instructions  
11 given from HR.

12 MR. BUDD: I'm asking what those  
13 instructions are and I haven't gotten an answer.

14 MR. LINDSLEY: Well, can you be more  
15 clear? Instructions about what in particular? I  
16 mean, the human resources manual is hundreds, if  
17 not -- well, I don't know about thousands but  
18 hundreds of pages long. So what question are you  
19 asking her whether she received any instructions  
20 about? The whole manual or certain aspects of it?

21 MR. BUDD: In accordance -- I want to  
22 know what specifically they -- she has ever been  
23 told by human resources about her compliance with  
24 federal and state EOO laws and policies. And if  
25 you want to go -- I can be even more specific about

1 age discrimination laws.

2 MR. LINDSLEY: Same objection. Again,  
3 if you can answer, go ahead.

4 THE WITNESS: Based on age  
5 discrimination law, rules I must follow. So I  
6 follow those directions and that is a federal law.

7 BY MR. BUDD:

8 Q. Okay. And that is based on directions you  
9 receive from the human resources department?

10 A. Based on directions for as a manager,  
11 supervisor, annual training update.

12 Q. When was the last time you got that  
13 training update?

14 A. Probably maybe a quarter ago, three months  
15 ago. It's an annual training --

16 Q. Okay. Did you ever --

17 A. -- from human resources.

18 Q. Okay. Did you ever receive that training  
19 before Ms. Bernard's termination?

20 A. Yes.

21 Q. Okay. When was the last time you received  
22 that before Ms. Bernard's termination?

23 A. It was an annual training so it was a year  
24 before.

25 Q. Okay.

1                           MR. BUDD: All right. Let's go off  
2 the record for a second to deal with some  
3 logistics. Okay?

4                           (A brief recess was taken.)

5 BY MR. BUDD:

6 Q. Ma'am, do you have what's been marked as  
7 Exhibit 2 in front of you? It's the state  
8 reduction in force policy dated October 7, 2021.

9 A. Yes.

10 Q. Take a minute and just review it for me.  
11 Make sure that's everything that it should be.

12 A. Okay.

13 Q. Okay. Is the -- is this the policy that  
14 governed how you were to conduct any reduction in  
15 force among the personnel of the budget office?

16 A. This is the state agency policy that the  
17 Univers -- yes. Used, for the reduction in force.

18 Q. Was this the policy that was in force at  
19 the time of Ms. Bernard's separation?

20 A. Human resources gave direction on this  
21 policy.

22 Q. So yes?

23 A. Yes.

24 Q. Okay. Did you review this policy at any  
25 time prior to initiating the reduction in force

1 that effected Ms. Bernard?

2 A. No.

3 Q. Did you review any other policies prior to  
4 initiating this reduction in force?

5 A. No.

6 Q. Did you review this policy at any time  
7 during the institution of the reduction in force  
8 that effected Ms. Bernard?

9 A. Could you rephrase that question?

10 Q. When was the first time that you reviewed  
11 this reduction in force policy? Was it before or  
12 after Ms. Bernard's discharge?

13 A. It was after. It was at the end of the  
14 whole process, HR went over this with me.

15 Q. Okay. So was it after she was identified  
16 for reduction or was it after the reduction was  
17 complete? If you understand the difference that  
18 I'm asking there.

19 A. I'm thinking, hesitating thinking of when  
20 we met. It was close to the end of the whole  
21 process. I'm not remembering exactly, but it was  
22 not before. So it was during the whole process, at  
23 the end of our decision of what -- not our decision  
24 but -- in reviewing everything and what my options  
25 would be as a supervisor of the budget office.

1           Q. Had Ms. Bernard already been identified for  
2 discharge at the time you first reviewed the  
3 reduction in force policy?

4           A. No.

5           Q. Okay. So at some time prior to her  
6 identification as being effected by the reduction  
7 in force, you reviewed Exhibit 2?

8           A. I was aware of RIF policy in the role of  
9 executive director of academic budgeting and in  
10 that role.

11          Q. Okay.

12          A. Our division had to go through a RIF  
13 process so I was aware of the policy.

14          Q. Were you -- when you were in that position,  
15 were you the one who was executing that RIF policy?

16          A. No.

17          Q. Okay. Were you effected by the RIF policy  
18 or by the RIF?

19          A. Could you rephrase? Was I?

20          Q. Yeah, were you targeted by the RIF? I know  
21 that sounds bad but --

22          A. No.

23          Q. Okay. All right. But you don't remember  
24 exactly when you first reviewed Exhibit 2 in  
25 relation to Ms. Bernard's reduction in force;

1 correct?

2 A. It was at the end of our process.

3 Q. Okay. Ms. Williams, could you turn to  
4 Exhibit 4, please. Let me know when you get there.

5 A. Exhibit 4. Okay.

6 Q. All right. If you could go with me to the  
7 absolute end of the exhibit. Page thirteen. Are  
8 you with me?

9 A. The end is an org chart?

10 Q. Yes, ma'am.

11 A. Yes.

12 Q. All right. Did you create this org chart?

13 A. Yes.

14 Q. When did you create this org chart?

15 A. This org chart may have been created the  
16 end of February.

17 Q. 2023?

18 A. To say an effective date if the realignment  
19 was approved would be March 1st.

20 Q. Of 2023?

21 A. Yes.

22 Q. Okay. The bottom of this page says  
23 accounting technician journey Lisa Bernard.

24 Did I read that correctly?

25 A. Yes.

1 Q. Does this chart depict anything happening  
2 to Ms. Bernard's position?

3 A. This org chart is a restructuring of the  
4 budget office. It shows an accounting technician,  
5 Lisa Bernard still on the org chart.

6 Q. So nothing -- under this chart, nothing was  
7 supposed to happen to Ms. Bernard; correct?

8 A. Let me read the emails that are in --  
9 attached with this.

10 Q. Sure. Take your time. We'll be getting to  
11 those emails as well. But just, yes, please review  
12 the whole exhibit.

13 A. So the purpose of this org chart was -- was  
14 to justify explanation of requesting two budget  
15 analysts positions at the time so it was not  
16 focusing on -- the highlighted yellow ones are the  
17 ones we were focusing on with the vice chancellor  
18 to re-establish a re-alignment within the budget  
19 office.

20 Q. Okay. Nothing in this chart shows that Ms.  
21 Bernard's position was going to be eliminated;  
22 correct?

23 A. Correct. There's nothing identified as an  
24 elimination.

25 Q. Okay. When was it determined that

1 Ms. Bernard's position would be eliminated as part  
2 of this restructuring?

3 A. There was never a decision to eliminate the  
4 position.

5 Q. Okay.

6 A. We were asking for a reclassification.

7 That means taking the current job, reclassifying it  
8 or recharacterizing it with other duties and  
9 responsibilities.

10 Q. Okay. Was that always the plan, according  
11 to this?

12 A. The intent was to always reclassify.

13 Q. Okay.

14 A. If you look at the emails in this exhibit,  
15 reached out to HR asking them for guidance for --  
16 to reclassify positions or to establish new ones.

17 Q. Why then was a reduction in force  
18 ultimately instituted if the intent was to  
19 reclassify the position?

20 A. There were other emails with direction from  
21 human resources that we worked on packages to  
22 submit to our UNC system office, human resources,  
23 to reclassify positions. Ms. Sheila Wright Zeigler  
24 notified me that the UNC system would not or did  
25 not approve to reclassify the accounting technician

1 position that Ms. Bernard was in.

2 Q. Okay. So when, exactly, was that decision  
3 made?

4 A. In February, 2023.

5 Q. Okay. All right. Let me ask you, do you  
6 see above the accounting technician role for  
7 Ms. Bernard, do you see the administration support  
8 specialist?

9 A. Yes.

10 Q. What are the job requirements for the  
11 administration support specialist position?

12 A. The job requirements?

13 Q. Yes, ma'am.

14 A. Could you rephrase? What are you meaning  
15 job requirements?

16 Q. Sure. Let me do this: Fayetteville State  
17 University at the Fort Liberty Center has a job  
18 posting recently for an administrative support  
19 specialist and they describe the position as a  
20 receptionist that serves as the first point of  
21 contact for the FSU at Fort Liberty office  
22 providing high quality customer service to service  
23 members, veterans, dependents and DOD civilians.  
24 This position requires strong communications skills  
25 and the ability to effectively learn and convey

1 FSU's policies and procedures. The role involved  
2 assisting with application inquiries, clerical  
3 duties, event coordination and maintaining  
4 informational materials. The minimum education  
5 requirement and experience requirements are a high  
6 school diploma and one year of related office  
7 experience, and preferred qualifications are  
8 Associate's degree, two years of higher education  
9 experience and one year of student services.

10 Is that similar to -- are those  
11 requirements similar to the requirements that the  
12 budget office has for the administrative support  
13 specialist position?

14 MR. LINDSLEY: Objection. You can go  
15 ahead and answer.

16 THE WITNESS: No. Our budget office,  
17 each office was different and unique. I don't have  
18 the -- so no. It's not the same.

19 MR. BUDD: Okay. How is it different  
20 and unique?

21 MR. LINDSLEY: Well, Joe, it's a  
22 little unfair, I think -- well, I don't want to  
23 make a speaking objection but she doesn't have what  
24 you read in front of her. She can't really make a  
25 comparison on the fly like that.

1 BY MR. BUDD:

2 Q. Sure. So let me ask you this: Is -- are  
3 there clerical duties in the administrative support  
4 specialist role in the budget office?

5 A. The role was to support all of the budget  
6 analyst positions. If they were approved the  
7 person would be a back-up support. The person also  
8 would schedule meetings, take minutes, but majority  
9 it had a strong emphasis on budgeting and assisting  
10 data gathering. So it was -- it would be uniquely  
11 different from the position that you read.

12 Q. Okay. Was it a receptionist position as  
13 well?

14 A. No. It was called administrative support  
15 specialist.

16 Q. Did --

17 A. So that was a higher level position than a  
18 receptionist.

19 Q. Are they responsible for greeting guests  
20 into the office?

21 A. To answer generically, yes. Whoever comes  
22 in, we all would greet.

23 Q. Got you.

24 Are there any differences between the  
25 administrative support specialist position and the

1 accounting technician role that Ms. Bernard had at  
2 the time of the her discharge?

3 A. Yes. They are two different positions.

4 Q. Okay.

5 A. Two different responsibilities.

6 Q. What are the differences?

7 A. The accounting technician position that  
8 Ms. Bernard was in was focusing on position control  
9 and data entry.

10 Q. Okay.

11 A. The administrative support specialist  
12 specialized in also assisting with data gathering.

13 Q. Okay. Did it require -- did the  
14 administrative support specialist, did that require  
15 the same level of experience and education levels  
16 as an accounting technician role?

17 A. I don't recall what was in the job  
18 description of both postings, which HR gave us  
19 guidance on. If I had those documents before me, I  
20 probably could answer clearly.

21 Q. Understood.

22 Let's go to page six, please, of Exhibit 4.

23 A. Page six.

24 Q. Yeah. It should just carry D sup exhibit  
25 1506.

1                   Do you see that?

2       A. 1506. Okay.

3       Q. Are you with me? It says justification to  
4 reclassify accounting technician?

5       A. Yes.

6       Q. All right. What evaluation and analysis  
7 did you perform to reach the determination that the  
8 position needed to be reclassified?

9       A. Could you rephrase your question?

10      Q. Sure. Did you -- was it ultimately your  
11 determination to reclassify the position of  
12 accounting technician to a budget analyst position?

13      A. My senior leadership vice chancellor for  
14 business and finance, a new hire came in and asked  
15 in the role that she needed the whole structure and  
16 function of the business -- budget office to  
17 refocus on budgeting forecasting, data analysis,  
18 gathering and analytic data. And so the  
19 restructuring direction was given to me from the  
20 vice chancellor. I contacted human resources.

21      Human resources actually provided the  
22 classifications of what the roles as budget analyst  
23 would or could be.

24      Q. Did your supervisor then specifically give  
25 the instruction to reclassify this position or was

1       that something that was in your discretion?

2           A. My supervisor gave me direction to  
3       reclassify the accounting technician position.

4           Q. Okay. Did your supervisor explain  
5       specifically why that was necessary?

6           A. Due to the accounting technician duties and  
7       responsibilities did not include analytic data  
8       analysis, forecasting, budget gathering, so the  
9       direction was to contact HR for assistance to  
10      create, reclassify or establish new positions in  
11      the budget office.

12          Q. Okay. If a position -- if the position  
13       could not be reclassified, was it the decision of  
14       your supervisor to eliminate the accounting  
15      technician position?

16          A. The direction from the supervisor was --  
17       gave additional funding to establish brand new  
18       positions. That was their direction. She gave  
19       additional funding to the budget office to  
20      establish new positions.

21          Q. Okay. So there was no -- there was not  
22       necessarily a directive to eliminate the accounting  
23      technician position?

24          A. No.

25          Q. Whose determination then, if there was

1 additional funding for the budget analyst position,  
2 whose decision was it then to eliminate,  
3 ultimately, the accounting technician position?

4 A. The decision had to be approved by the vice  
5 chancellor and human resources and our chancellor  
6 to do a reduction in force.

7 Q. Okay. That was the review of the decision.  
8 Correct?

9 A. And approval.

10 Q. And approval. My question is whose idea  
11 was it originally, then? If your supervisor is  
12 giving you extra money for this new position, whose  
13 decision was it to eliminate the position of  
14 accounting technician?

15 A. The approval had to come from the vice  
16 chancellor.

17 Q. Whose idea was it initially?

18 A. The -- it comes from direction and guidance  
19 with HR that does their assessment. HR will give  
20 us direction and the best way to handle. I would  
21 bring that information to my vice chancellor and a  
22 decision would be made.

23 Q. Okay. Was it your decision ultimately to  
24 eliminate the role of accounting technician?

25 A. This position that I have before me was

1 actually a reclassification so this position was  
2 never eliminated. The documentation before me was  
3 requesting a current vacant accounting technician  
4 position to be reclassified as a budget analyst 2.

5 Q. Okay.

6 A. And as you can see dated and the  
7 documentation, February 10th, it was submitted and  
8 approved in April, 2023, that same year.

9 Q. All right. Let's go to --

10 A. It was vacant.

11 Q. I'm sorry. Which position was vacant?

12 A. The position on your 1506.

13 Q. Right. It was vacant at that time because  
14 Ms. Bernard was let go. Correct?

15 A. No.

16 Q. Okay. How was it vacated?

17 A. It was vacated because a previous employee  
18 applied for a different position and they were  
19 selected and this position became vacant.

20 Q. All right. Let's go to page one of Exhibit  
21 4.

22 Actually -- sorry. For clarification, if  
23 the position of accounting technician was never  
24 eliminated, is that what your testimony was?

25 A. This position in the documentation was

1 reclassified as a budget analyst 2.

2 Q. Okay. What about Ms. Bernard's position?

3 What specifically happened to that position?

4 A. After the RIF process, the position through  
5 HR is no -- is no longer in the system once a RIF  
6 has happened. The position is no longer. It's  
7 abolished.

8 Q. So -- so Ms. Bernard's position is no  
9 longer in existence; correct?

10 A. That's correct.

11 Q. Okay.

12 A. As the accounting technician, that position  
13 no longer exists.

14 Q. Okay. And so what you're saying is that  
15 the other position there -- okay. I think I got  
16 you.

17 Let's -- are you still with me on page one  
18 of Exhibit 4, ma'am?

19 A. Yes.

20 Q. All right. I think this is what you were  
21 saying earlier. I no longer want to reclassify any  
22 current positions. I'm requesting to establish a  
23 new position as budget analyst 1. It's okay to  
24 establish a new position as EHRA; correct?

25 A. Yes.

1           Q. All right. And so basically this  
2 documentation states that a new position has been  
3 created or you are seeking the creation of a new  
4 position, not necessarily the reclassification at  
5 this point?

6           A. Yes.

7           Q. Okay. Once that reclassification though  
8 has been accomplished, it was your intention to  
9 eliminate Ms. Bernard's position; correct?

10          A. Could you rephrase what you're asking?

11          Q. Yes. We -- at what point had you  
12 determined at this point -- strike that.

13                 At what point did you determine that  
14 Ms. Bernard's position would be eliminated? Was it  
15 before or after February 10th, 2023?

16          A. It was after.

17          Q. Okay.

18          A. Because --

19          Q. Yeah. Because what?

20          A. We requested to establish a new position.  
21 So the new budget analyst position 1 was created  
22 and approved April, 2023.

23          Q. Okay. And then through -- and then through  
24 that, it was -- you then instituted a reduction in  
25 force plan to eliminate Ms. Bernard's position;

1 correct?

2 A. Yes.

3 Q. Okay. All right. Let's look at Exhibit 5,  
4 please -- actually -- no. Sorry. Stick on page  
5 one of Exhibit 4. I apologize. One last question  
6 about this document.

7 Very first email in this chain you ask  
8 hopefully we'll get it right this time.

9 Do you see that? What were you referring  
10 to when you wrote that?

11 A. I was referring to originally the  
12 accounting technician that Ms. Bernard was in, to  
13 request it being reclassified as an SHRA position,  
14 accounting technician, to be reclassified. HR  
15 officially notified me that the UNC system said all  
16 budget analyst positions cannot be SHRA. They must  
17 convert, due to a UNC system audit, business and  
18 finance positions must be EHRA.

19 Q. Okay.

20 A. And my response to her was then let's not  
21 pursue that --

22 Q. Okay.

23 A. -- to reclassify as an SHRA. We must  
24 create a brand new position as EHRA.

25 Q. Thank you.

1 A. Mm-hmm.

2 Q. Now, let's go to Exhibit 5, please. Are  
3 you there?

4 A. I believe so.

5 Q. All right. It should have it -- it should  
6 be a three page Exhibit pages 20, 21 and 22 at the  
7 bottom.

8 A. Oh, yes. I have it in front of me.

9 Q. Is this the reduction force plan for  
10 Fayetteville State University budget office dated  
11 March 23rd, 2023?

12 A. Yes.

13 Q. Did you draft this?

14 A. No.

15 Q. Who drafted this?

16 A. Ms. Kay Faircloth. She's the assistant  
17 vice chancellor for human resources.

18 Q. Is that your signature on page 22?

19 A. No.

20 Q. Whose -- do you know who's the agency head  
21 signature?

22 A. The top signature is the chancellor,  
23 Darrell Allison, the second signature is Carl Dean.

24 Q. All right. When was the first time you've  
25 reviewed or seen Exhibit 5?

1           A. I don't recall the date. I believe it was  
2 during this lawsuit and documents were provided for  
3 me to review.

4           Q. Got it. Okay. So you had no role  
5 whatsoever in preparing this document?

6           A. That's correct.

7           Q. Okay. All right. Ms. Williams, can you go  
8 to the second page of this document --

9           A. Yes.

10          Q. -- alternatives to layoff.

11           Are you with me?

12          A. Yes.

13          Q. Do you see that?

14           The University reviewed current and  
15 anticipated vacancies in the division of business  
16 and finance for potential openings and has not  
17 identified a suitable opportunity for the effected  
18 employee.

19           Did I read that correctly?

20          A. Yes.

21          Q. Okay. Did you participate in the review of  
22 current and anticipated vacancies that's referred  
23 to here?

24          A. No. No. I did not.

25          Q. Okay. Were you ever contacted or asked

1 about Ms. Bernard's qualifications or abilities to  
2 perform the administrative support specialist role?

3 A. No.

4 Q. Did you ever consider Ms. Bernard for that  
5 role?

6 A. No. At the time the position was posted  
7 vacant so it was open for anyone to apply to it.

8 Q. Okay. But you did not specifically suggest  
9 that or recommend it?

10 A. No.

11 Q. In your year of working with Ms. Bernard,  
12 is it your opinion that she would have qualified  
13 for the position of administrative support  
14 specialist?

15 A. Ask me -- rephrase.

16 Q. Sure. In the year working with  
17 Ms. Bernard, you observed her work ethic and her  
18 qualifications; correct?

19 A. Yes.

20 Q. In that year of learning those things, have  
21 you -- are you able to form an opinion as to  
22 whether or not Ms. Bernard would have been  
23 qualified for the administrative support specialist  
24 role that was vacant?

25 A. This position may have been a lower level

1 position for Ms. Bernard. So I did not consider  
2 her. However, she was free to apply.

3 Q. In your opinion, would she have qualified  
4 for those -- the requirements and expectations of  
5 that role?

6 A. She could have applied based on her  
7 information or her background, she could have  
8 applied.

9 Q. Okay. Would she have been, in your  
10 opinion, a good candidate for the role?

11 A. She could have applied and HR would have  
12 screened through all the applicants and gave --  
13 provided to me two to three candidates that  
14 qualified and that's what HR's role is to go and  
15 confirm an employee is qualified for that position.

16 Q. Okay. In your opinion would she -- again,  
17 do you think she -- if you had been given her  
18 resume, knowing what you know about her, would --

19 A. If she had applied and HR gave me the two  
20 to three names and Ms. Bernard was one of them, she  
21 would have interviewed -- I would have interviewed  
22 her just as the other applicants.

23 MR. BUDD: I might be done with my  
24 questions. I just want to go through my notes.  
25 Okay?

1 MR. LINDSLEY: Few minutes then?

2 MR. BUDD: Yeah. Give me, like, five  
3 minutes.

4 (A brief recess was taken.)

5 MR. BUDD: We can go back on the  
6 record.

7 All right. Ma'am. I have no further  
8 questions.

9 MR. LINDSLEY: I do have some  
10 questions to follow up.

11 EXAMINATION

12 BY MR. LINDSLEY:

13 Q. Ms. Williams, when you started in your role  
14 in the budget office, was there a plan at all to  
15 create budget analyst positions?

16 A. No.

17 Q. When did that idea begin?

18 A. The idea began when the new vice chancellor  
19 for business and finance was appointed to the  
20 business office.

21 Q. Who was that?

22 A. Dr. Lillian Wanjovi.

23 Q. And is she the person you were referring to  
24 earlier who gave you the direction to make the  
25 budget analyst positions?

1 A. Yes.

2 Q. Now, the budget analyst positions  
3 themselves, were they a position that -- well,  
4 strike that. How was it that the budget analyst  
5 positions in particular with their description came  
6 to be the ones that were used for these new  
7 positions?

8 A. The direction of the UNC system office was  
9 to make sure all budget offices had budget analyst  
10 positions.

11 Q. And the description that go along with  
12 those, did you come up with the budget analyst job  
13 description?

14 A. Our human resources office provided the job  
15 descriptions of the budget analyst positions.

16 Q. Now, when you started in the budget office,  
17 how many account technician positions were there?

18 A. There were three accounting technician  
19 positions.

20 Q. How many of them were filled?

21 A. Two were filled.

22 Q. Okay. And was Lisa Bernard one of them?

23 A. Yes.

24 Q. Who was the other filled account  
25 technician?

1 A. Jan-Jee Wells.

2 Q. And was there a vacant account technician  
3 position as well?

4 A. Yes.

5 Q. Now, we used the word reclassify or  
6 reclassification earlier. What does that mean in  
7 terms of the account technician positions and the  
8 budget analyst positions?

9 A. Reclassify is taking a current position,  
10 changing the duties and responsibilities and  
11 changing the title.

12 Q. When you reclassify a position like that,  
13 is it possible to just take the employee from the  
14 previous position and put them in the new  
15 reclassified position?

16 A. Yes.

17 Q. Is that what happened here? Let me ask a  
18 different question.

19 Jan-Jee's position, she was an account  
20 technician. Did she at some point move to a budget  
21 analyst position?

22 A. Yes.

23 Q. While she was still an account technician,  
24 had you created within your office a new budget  
25 analyst position?

1 A. Yes.

2 Q. Was that an EHRA or an SHRA position?

3 A. That was an EHRA position.

4 Q. Why was it an EHRA position?

5 A. It was an EHRA position based on the UNC  
6 system auditing. They -- all budget analysts must  
7 be EHRA position, which is a certain classification  
8 and hiring rules apply and because of that, Jan-Jee  
9 in the accounting technician position was SHRA, she  
10 had to apply for the position and there had to be a  
11 competitive search on all EHRA positions.

12 Q. And so Jan-Jee, did she apply?

13 A. Yes.

14 Q. Was -- were there other candidates  
15 considered for that position?

16 A. Yes.

17 Q. Was she hired for that budget analyst  
18 position?

19 A. Yes.

20 Q. Now once she had been hired for the budget  
21 analyst position was her old account technician  
22 position vacant?

23 A. Yes.

24 Q. What happened with that account technician  
25 position?

1           A. The accounting technician position that was  
2 vacant, paperwork was submitted to human resources  
3 asking it to be reclassified as a budget analyst  
4 EHRA position.

5           Q. Okay. And as a budget -- in that  
6 circumstance, Jan-Jee's empty position, were you  
7 asking for a reclassification to a second budget  
8 analyst position?

9           A. Yes.

10          Q. So that would be a budget analyst position  
11 different from the one that Jan-Jee applied for and  
12 was hired for?

13          A. Yes.

14          Q. Did that change ultimately happen?

15          A. Yes.

16          Q. Why was a reclassification possible in that  
17 circumstance with an empty account technician  
18 position when it wasn't possible with the filled  
19 account technician positions?

20          A. It was due to direction I got from human  
21 resources was it was better -- easier to reclassify  
22 a vacant position where no one was in it and  
23 convert it to an EHRA position.

24          Q. And just to be clear, the account  
25 technician positions, were they EHRA or SHRA?

1           A. All current budget analyst positions that  
2 were in the budget office are EHRA.

3           Q. What about the account technician  
4 positions? Which classification were they?

5           A. SHRA.

6           Q. Now, after the vacant account technician  
7 position that Jan-Jee was in was reclassified to a  
8 budget analyst position, you then had how many  
9 budget analyst positions in the office?

10          A. Two.

11          Q. How many did you intend to have in the  
12 office?

13          A. Three.

14          Q. So deduction you had one more budget  
15 analyst position to create or to have in the  
16 office; correct?

17          A. Correct.

18          Q. What was your intention when this whole  
19 process began, with regard to Ms. Bernard and the  
20 third budget analyst position?

21          A. My intention was to reclassify the position  
22 Ms. Bernard was in as a budget analyst.

23          Q. If that plan had worked, would Ms. Bernard  
24 have simply been moved from her account technician  
25 position into the budget analyst position?

1 A. Yes.

2 Q. Did there come a time that you learned that  
3 that would not be possible?

4 A. Yes.

5 Q. When was that?

6 A. In February '23.

7 Q. And who informed you that that plan would  
8 not work?

9 A. Ms. Sheila Wright Zeigler. She was the  
10 classification and compensation specialist in human  
11 resources.

12 Q. What ultimately became the plan for this  
13 transition from Ms. Bernard's account technician  
14 position to the now third budget analyst position  
15 in the office?

16 A. The same process as Ms. Wells. We were --  
17 my intent was because now the position is EHRA, it  
18 had to be a competitive bid search to apply for the  
19 position.

20 Q. Okay. And so are you saying it couldn't  
21 simply be reclassified?

22 A. Correct. Because it was an SHRA position,  
23 accounting technician.

24 Q. And Ms. Bernard was in that position;  
25 correct?

1 A. Correct.

2 Q. So what ultimately was determined would  
3 need to happen to make that change from  
4 Ms. Bernard's account technician position to the  
5 new budget analyst position?

6 A. So, to keep the three positions as budget  
7 analysts that we would have, she would have to  
8 re -- to apply and then after we got the three  
9 positions we had to come up with a plan why are we,  
10 human resources is asking us why we still have an  
11 accounting technician position.

12 Q. Now, when Ms. Bernard, when her position  
13 was being -- after you heard from HR that a simple  
14 reclassification would not work --

15 A. Would not -- mm-hmm.

16 Q. -- is that when the RIF plan became the  
17 working plan?

18 A. Yes.

19 Q. Was that your idea to do a reduction in  
20 force with regard to Ms. Bernard's position?

21 A. No. I worked with HR to provide guidance  
22 and direction. HR gave us options on what to do  
23 and it was one of -- it was the option -- the only  
24 option that we could have done at that point.

25 Q. So HR -- did HR say this is how it's going

1 to have to be done?

2 A. Yes.

3 Q. Ms. Bernard, in her role as account  
4 technician, was part of her responsibilities  
5 dealing with job -- well, strike that.

6 When Ms. -- when Dr. Wanjovi first  
7 mentioned this plan to create different jobs within  
8 the budget office, when she first started talking  
9 about that, did you have any intention to let  
10 Ms. Bernard go?

11 A. No.

12 Q. As this plan started to unfold and progress  
13 and exchanges were being made, did you at some  
14 time, except for the reduction in force action,  
15 have any intention to fire or otherwise terminate  
16 Ms. Bernard's employment?

17 A. No.

18 Q. Was the RIF action the only reason she was  
19 subject to release from employment?

20 A. Yes.

21 Q. Did Ms. Bernard ever apply for any of the  
22 budget analyst positions?

23 A. No.

24 MR. LINDSLEY: I believe those are all  
25 the questions. Thank you.

1 RE-EXAMINATION

2 BY MR. BUDD:

3 Q. I've got just a few follow ups on that.

4 Ms. Williams, did you ever consider using a  
5 recruitment waiver for Ms. Bernard?

6 A. No.

7 Q. Why not?

8 A. That was not an option given to me in this  
9 role.

10 Q. Okay. Who would have given you that  
11 option?

12 A. It had to come from our chancellor.

13 Q. Okay. Is that -- I apologize. I don't  
14 remember your testimony from earlier but is that  
15 what happened when you were given a recruitment  
16 waiver into your current position?

17 A. Yes. The chancellor.

18 Q. Do you know if that option was ever  
19 presented to the chancellor?

20 A. No.

21 Q. You don't know or that option was never  
22 presented to the chancellor?

23 A. No. I don't know.

24 MR. BUDD: I have no further  
25 questions. Thank you, ma'am.

1 MR. LINDSLEY: All right. Madam court  
2 reporter she will read and sign.

3 (The deposition concluded at 3:45  
4 p.m.)

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1 ERRATA SHEET

2  
3 Case name: Bernard

4 vs.

5 Fayetteville State

6 Case number: 5:24-cv-00219-BO-RN

7 Witness name: SANDRA GAIL WILLIAMS

8 Date: April 9, 2025

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1 SIGNATURE PAGE  
2

3 I, Sandra Gail Williams, do hereby  
4 state under oath that I have read the above and  
5 foregoing deposition in its entirety and that the  
6 same is a full, true and correct transcript of my  
7 testimony, subject to the attached list of  
8 corrections, if any.

9 \_\_\_\_\_  
10  
11  
12

13  
14 Sworn to and subscribed before me  
15 this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.  
16  
17

18 \_\_\_\_\_  
19 Notary Public

20 My commission expires: \_\_\_\_\_  
21

22 Mail to:  
23 Depositions, Inc.  
24 1000 N. Main Street, Suite 215  
25 Fuquay-Varina, NC 27526

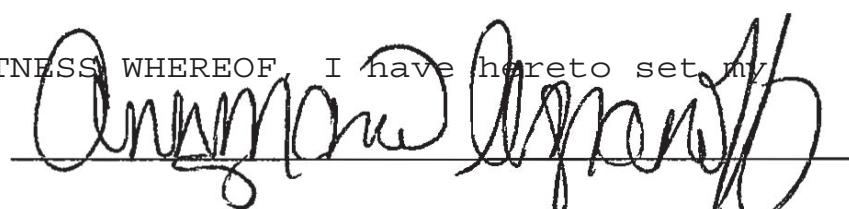
1 STATE OF NORTH CAROLINA

2 COUNTY OF WAKE

3 CERTIFICATE

4 I, Ann Marie Agranoff, a Notary Public in  
5 and for the State of North Carolina duly commissioned  
6 and authorized to administer oaths and to take and  
7 certify depositions, do hereby certify that on April  
8 9, 2025, SANDRA GAIL WILLIAMS, being by me personally  
9 duly sworn to tell the truth, thereupon testified as  
10 above set forth as found in the preceding pages, this  
11 examination being reported by me verbatim and then  
12 reduced to typewritten form under my direct  
13 supervision; that the foregoing is a true and correct  
14 transcript of said proceedings to the best of my  
15 ability and understanding; that I am not related to  
16 any of the parties to this action; that I am not  
17 interested in the outcome of this case; that I am not  
18 of counsel nor in the employ of any of the parties to  
19 this action.

20 IN WITNESS WHEREOF I have hereunto set my  
21 hand.



23 Ann Marie Agranoff  
24 Notary Public

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